

Linda S. Fossi, Esq. (ID #1720)
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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
HONORABLE Donald H. Steckroth
CASE NO. 05-21734-DHS

Chapter 7

In the Matter of:

GWENDOLYN TAYLOR DBA
PRO IMAGE,

Debtor.

- . **NOTICE OF CREDITOR'S MOTION FOR**
- . **RELIEF FROM AUTOMATIC STAY**
- . **PURSUANT TO 11 U.S.C. SECTION 362 (d) (1)**
- .
- .
- .
- .

HEARING DATE AND TIME:
May 17, 2005, 10:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

Stephen B. McNally, Esq.
Attorney for Debtor
McNally & Busche, L.L.C.
40 Park Place
Newton, NJ 07860

Charles Forman, Esq. (Trustee)
Forman, Holt & Eliades LLC
218 Route 17 North
Rochelle Park, NJ 07662

Office of the U.S. Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

Gwendolyn Taylor dba Pro Image (Debtor)
14 Cliffside Court
Hamburg, NJ 07419

PLEASE TAKE NOTICE that on May 17, 2005, at 10:00 a.m., or as soon thereafter as counsel may be heard, Deily, Mooney & Glastetter, LLP, attorneys for DCFS Trust, the within creditor ("Creditor"), shall move before the Honorable Donald H. Steckroth, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, NJ 07102, for an Order pursuant to 11 U.S.C. Section 362(d)(1) granting such Creditor relief from automatic stay or, in the alternative, directing the Debtor, above-named, to immediately provide for the adequate protection of any property subject to the interests of such Creditor; for

costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Motion of Linda S. Fossi, Esq. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the Clerk, United States Bankruptcy Court, P.O. Box 1352, Newark, NJ 07101-1352 and simultaneously served on Creditor's counsel, Deily, Mooney & Glastetter, LLP, One Greentree Centre, Suite 201, Marlton, NJ 08053 (Attention: Linda S. Fossi, Esq.) so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

Dated: April 18, 2005

DEILY, MOONEY & GLASTETTER, LLP
Attorneys for DCFS Trust
Chapter April 12, 2005 Creditor

By: \s\ Linda S. Fossi
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